

ALAN A. DRESSLER, ESQ. (SBN #56916)
 400 Montgomery St., Suite 200
 San Francisco, California 94104
 Tel.: (415) 421-7980
 Fax: (415) 421-7021
 E-mail : alandressler@aol.com

Attorney for Defendant John Keller

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-0061 EMC
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER TO CONTINUE STATUS/
)	CHANGE OF PLEA HEARING
JOHN KELLER et al.)	AS TO DEFENDANT JOHN KELLER
)	
Defendants.)	

STIPULATION

The United States of America and defendant JOHN KELLER, by and through their respective counsel, hereby stipulate and ask the court to find as follows:

1 Defendant John Keller is presently set for a status/possible change of plea hearing on March 19, 2014.

2. The parties have been engaged in good faith negotiations and as of March 12, 2014 had reached an agreement in principal. However, on March 12, 2014 the U.S. Attorney's Office announced a change of policy regarding a pending guideline amendment which will require that the plea agreement be modified and then re-submitted for approval.

3. Based on the foregoing the parties request that the court vacate the current status date of March 19, 2014 and set a new status/change of plea date of April 23, 2014 at 2:30 p.m.

1 So stipulated:

2
3 Dated: March 14, 2014

MELINDA HAAG
United States Attorney

4
5 /s/ Kevin Barry
KEVIN BARRY
Assistant U.S. Attorney

6
7
8 Dated: March 14, 2014

/s/ Alan A. Dressler
ALAN A. DRESSLER
Counsel for Defendant
John Keller

Alan A. Dressler, Esq. (SBN 56916)
400 Montgomery St., Ste 200
San Francisco, CA 94104
Tel. (415) 421-7980
Fax (415) 421-7021
E-Mail: alandressler@aol.com

Attorney for Defendant John Keller

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN KELLER et al.,

Defendants.

No. CR 12-0061 EMC

[PROPOSED] ORDER CONTINUING
STATUS/CHANGE OF PLEA HEARING AS
TO DEFENDANT JOHN KELLER

GOOD CAUSE APPEARING, and pursuant to the stipulation of the government and defendant John Keller, IT IS HEREBY ORDERED that the status/change of plea hearing date currently scheduled for March 19, 2014 is vacated.

IT IS FURTHER ORDERED that a new status/change of plea hearing date is set for April 23, 2014 at 2:30 p.m.

IT IS SO ORDERED.

Dated: 3/17/14

Stipulation and Proposed Order
CR 12-0061 EMC

